

EXHIBIT G

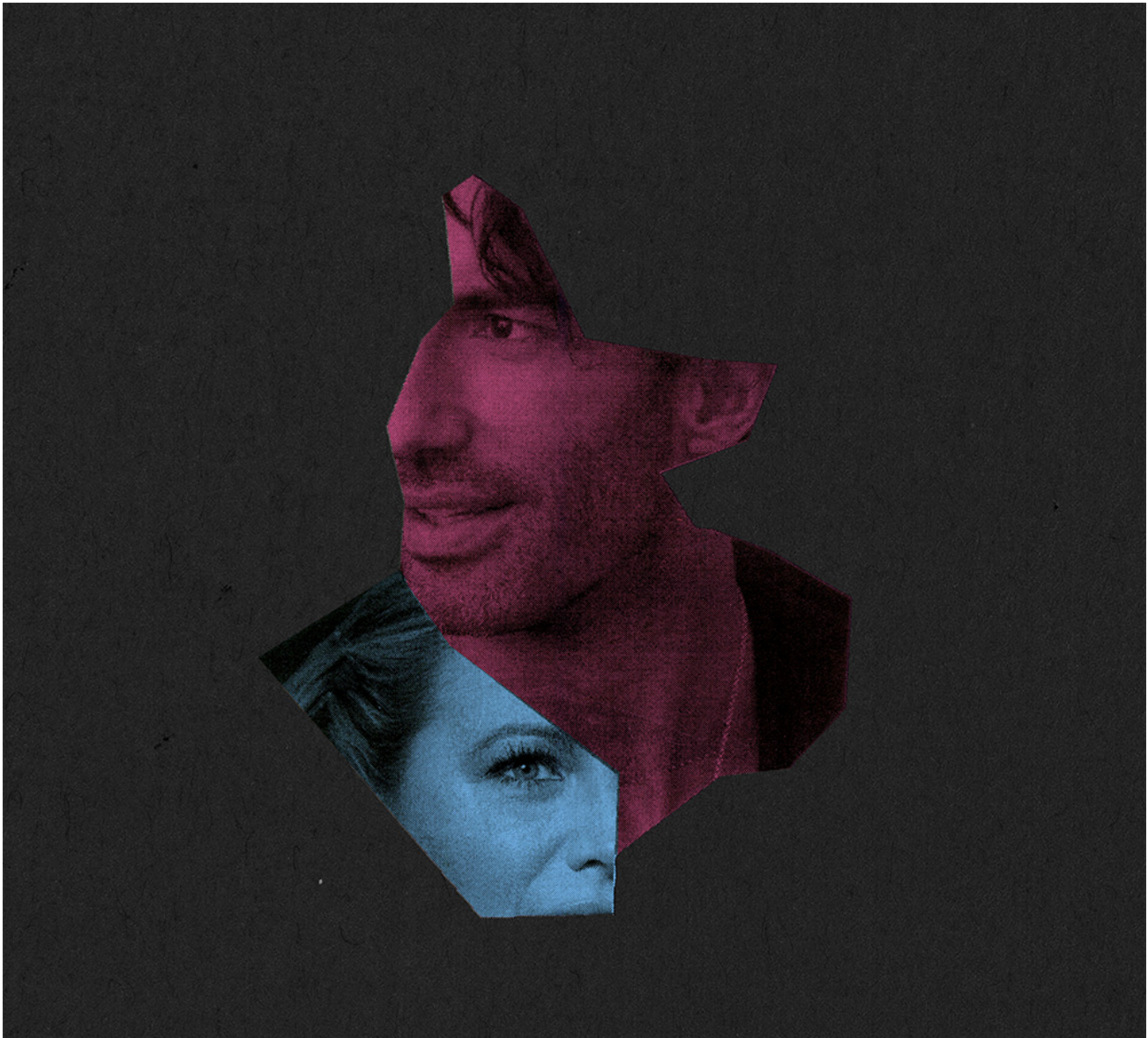
The New York Times

<https://www.nytimes.com/2024/12/21/business/media/blake-lively-justin-baldoni-it-ends-with-us.html>

‘We Can Bury Anyone’: Inside a Hollywood Smear Machine

Private messages detail an alleged campaign to tarnish Blake Lively after she accused Justin Baldoni of misconduct on the set of “It Ends With Us.”

▶ Listen to this article · 18:33 min [Learn more](#)



Najeebah Al-Ghadban

By Megan Twohey, Mike McIntire and Julie Tate

Published Dec. 21, 2024 Updated Dec. 22, 2024

Last summer, as the release of “It Ends With Us” approached, Justin Baldoni, the director and a star of the film, and Jamey Heath, the lead producer, hired a crisis public relations expert.

During shooting, Blake Lively, the co-star, had complained that the men had repeatedly violated physical boundaries and made sexual and other inappropriate comments to her. Their studio, Wayfarer, agreed to provide a full-time intimacy coordinator, bring in an outside producer and put other safeguards on set. In a side letter to Ms. Lively’s contract, signed by Mr. Heath, the studio also agreed not to retaliate against the actress.

But by August, the two men, who had positioned themselves as feminist allies in the #MeToo era, expressed fears that her allegations would become public and taint them, according to a legal complaint that she filed Friday. It claims that their P.R. effort had an explicit goal: to harm Ms. Lively’s reputation instead.

Her filing includes excerpts from thousands of pages of text messages and emails that she obtained through a subpoena. These and other documents were reviewed by The New York Times.

There have long been figures behind the scenes shaping public opinion about celebrities — through gossip columns, tabloids and strategic interviews. The documents show an additional playbook for waging a largely undetectable smear campaign in the digital era. While the film, about domestic violence, was a box office hit — making nearly \$350 million worldwide — online criticism of the actress skyrocketed.

“He wants to feel like she can be buried,” a publicist working with the studio and Mr. Baldoni wrote in an Aug. 2 message to the crisis management expert, Melissa Nathan.

“You know we can bury anyone,” Ms. Nathan wrote.

In the following weeks, Ms. Nathan, whose clients have included Johnny Depp and the rappers Drake and Travis Scott, went hard at the press, pushing to prevent stories about Mr. Baldoni’s behavior and reinforce negative ones about Ms. Lively, the text messages show. Jed Wallace, a self-described “hired gun,” led a digital strategy that included boosting social media posts that could help their cause.

An attorney for Wayfarer said in a statement to The Times that the studio, its executives and public relations representatives “did nothing proactive nor retaliated” against Ms. Lively, and accused the actress of “another desperate attempt to ‘fix’ her negative reputation.”

“These claims are completely false, outrageous and intentionally salacious with an intent to publicly hurt and rehash a narrative in the media,” the lawyer, Bryan Freedman, wrote.

Mr. Freedman did not address her allegations about misconduct during the filming by Mr. Baldoni and Mr. Heath. He alleged that Ms. Lively planted “negative and completely fabricated and false stories with media” about Mr. Baldoni, which he said “was another reason why Wayfarer Studios made the decision to hire a crisis professional.”

The effort to tarnish Ms. Lively appears to have paid off. Within days of the film's release, the negative media coverage and commentary became an unusually high percentage of her online presence, according to a forensic review she sought from a brand marketing consultant.

Ms. Lively — who is married to the actor and entrepreneur Ryan Reynolds of “Deadpool” fame, and is close with Taylor Swift — experienced the biggest reputational hit of her career. She was branded tone-deaf, difficult to work with, a bully. Sales of her new hair-care line plummeted.

“Is Blake Lively set to be CANCELLED?” read a Daily Mail headline one week into the attacks.

Mr. Baldoni, by contrast, emerged largely unscathed. This month, he was honored at a star-studded event celebrating men who “elevate women, combat gender-based violence and promote gender equality worldwide.” On Saturday, however, after this article was published, the talent agency William Morris Endeavor stopped representing Mr. Baldoni, said Ari Emanuel, chief executive of Endeavor, the agency's parent company.



Justin Baldoni received an award this month for being an ally to women. A legal filing has since accused him of harassment and retaliation against the actress Blake Lively.

Jeenah Moon for The New York Times

Ms. Lively's complaint — against Mr. Baldoni; Mr. Heath; Wayfarer; Steve Sarowitz, a co-founder of the studio; Mr. Wallace; Ms. Nathan; and Jennifer Abel, another public relations executive involved in the campaign — alleges sexual harassment and retaliation, among other claims. The complaint, filed with the California Civil Rights Department, is a precursor to a lawsuit.

In a statement, Ms. Lively said, “I hope that my legal action helps pull back the curtain on these sinister retaliatory tactics to harm people who speak up about misconduct and helps protect others who may be targeted.”

She also denied that she or any of her representatives planted or spread negative information about Mr. Baldoni or Wayfarer.

‘We Should Have a Plan’

In May, several months after the filming wrapped, Mr. Baldoni realized that Mr. Reynolds had blocked him on Instagram.

“We should have a plan for IF she does the same when movie comes out,” Mr. Baldoni wrote of Ms. Lively in a text exchange that included Ms. Abel, a publicist who has long worked with him and Wayfarer. “Plans make me feel more at ease.”

Mr. Baldoni, 40, and Mr. Heath, 55, had a lot riding on the film, which is based on a best-selling novel by Colleen Hoover.

Mr. Baldoni was best known for the CW satirical romantic dramedy “Jane the Virgin.” Wayfarer provided the resources for bigger ambitions. It was bankrolled by the billionaire Steve Sarowitz, who is co-chair of the studio with Mr. Baldoni. They and Mr. Heath, the chief executive, are all deeply involved with the Baha’i religious organization, which promotes unity, peace and gender equality. Mr. Baldoni has presented himself as an ally to women, writing books, co-hosting a podcast with Mr. Heath and giving talks on toxic masculinity.

Ms. Lively, 37, was by far the bigger star. The TV show “Gossip Girl” catapulted her to early fame, and she appeared in films ranging from “The Sisterhood of the Traveling Pants” to “The Town.” She built businesses outside the entertainment industry, appeared on the covers of glossy magazines and amassed more than 45 million Instagram followers.

Ms. Lively had expressed concerns about Mr. Baldoni from the beginning, according to her legal complaint. Before shooting began, for example, she objected to sex scenes he wanted to add that she considered gratuitous.

In November 2023, as the cast of “It Ends With Us” was preparing to resume shooting after a monthslong writers’ strike, Ms. Lively went to Wayfarer with the side letter seeking safeguards.



Mr. Baldoni, co-chair of the film studio, and Jamey Heath, the chief executive, are alleged to have engaged in sexually inappropriate conduct. James Devaney/GC Images, via Getty Images

“Our client is willing to forego a more formal HR process in favor of everyone returning to work and finishing the Film as long as the set is safe moving forward,” her legal team wrote to the studio.

She detailed her complaints during a meeting with Mr. Baldoni, Mr. Heath and other producers in January, according to the legal filing. She claimed Mr. Baldoni had improvised unwanted kissing and discussed his sex life, including encounters in which he said he may not have received consent. Mr. Heath had shown her a video of his wife naked, she said, and he had watched Ms. Lively in her trailer when she was topless and having body makeup removed, despite her asking him to look away. She said that both men repeatedly entered her makeup trailer uninvited while she was undressed, including when she was breastfeeding.

In agreeing to the terms that Ms. Lively sought, Wayfarer acknowledged that “Although our perspective differs in many aspects, ensuring a safe environment for all is paramount,” according to her legal complaint.

By the spring, Ms. Lively told people she worked with that the men’s behavior had improved with the new protections.

But she was now in a creative battle with them. With the support of Sony, the film's distributor, she made her own cut of the movie, bringing in editors and a composer and adding one of Ms. Swift's songs. In the end, Sony and Wayfarer went with Ms. Lively's cut, and she got a producer credit.



The author Colleen Hoover and cast members Brandon Sklenar, Isabela Ferrer and Ms. Lively, promoting the film "It Ends With Us" without Mr. Baldoni. Eric Charbonneau/Getty Images for Sony Pictures

As the film release neared, Ms. Lively and other cast members informed Sony and Wayfarer that they would not do any appearances alongside Mr. Baldoni. So did Ms. Hoover, the author, who had her own dissatisfactions with him and had become more upset after he told her about Ms. Lively's allegations, according to text messages from Mr. Baldoni and Mr. Heath.

'Most Importantly Untraceable'

By the first week of August, Wayfarer and Mr. Baldoni had retained Ms. Nathan, who had worked with high-profile clients including Mr. Depp, whose ex-wife, Amber Heard, accused him of physical abuse.

Got a confidential news tip? The New York Times would like to hear from readers who want to share messages and materials with our journalists.

See how to send a secure message at nytimes.com/tips

Mr. Depp successfully sued Ms. Heard for defamation, and the trial became a spectacle amid suspicions of an online campaign to damage her credibility.

This year, after a decade at the New York consultancy Hiltzik Strategies, Ms. Nathan started her own firm, TAG PR. Its majority stakeholder is a company run by the entertainment industry executive Scooter Braun.

In an initial planning document sent to Wayfarer and Mr. Baldoni on Aug. 2, Ms. Nathan suggested media talking points, including that Ms. Lively used an imbalance of power to take creative control of the film.

But Mr. Baldoni wanted more.

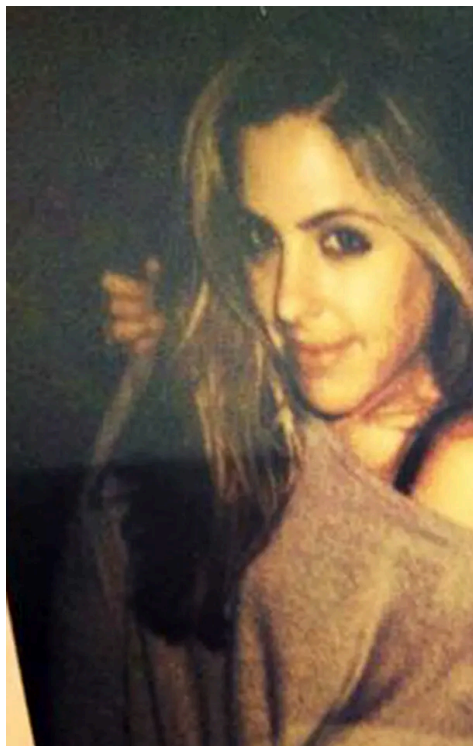
“Not in love with the document they sent,” he responded in a text exchange that included Ms. Abel and Mr. Heath. “Not sure I’m feeling the protection I felt on the call.”

Ms. Abel relayed his frustration to Ms. Nathan: “I think you guys need to be tough and show the strength of what you guys can do in these scenarios. He wants to feel like she can be buried.”

“Of course- but you know when we send over documents we can’t send over the work we will or could do because that could get us in a lot of trouble,” Ms. Nathan responded, adding, “We can’t write we will destroy her.”

Moments later, she said, “Imagine if a document saying all the things that he wants ends up in the wrong hands.”

“You know we can bury anyone,” she wrote.



Mr. Baldoni and Mr. Heath hired Melissa Nathan, a crisis P.R. expert whose clients have included Johnny Depp and Drake.



Jennifer Abel was already working on public relations for Wayfarer when Ms. Nathan was hired. Vivien Killilea/Getty Images for Alex And Ella

Three days later, Mr. Baldoni texted Ms. Abel, flagging a social media thread that accused another celebrity of bullying behavior and had generated 19 million views. “This is what we would need,” he wrote.

Ms. Nathan soon floated proposals to hire contractors to dominate social media through “full social account take downs,” by starting “threads of theories” and generally working to “change narrative.”

“All of this will be most importantly untraceable,” she wrote.

JENNIFER ABEL

I think we need to put the social combat
plan into motion

MELISSA NATHAN

So do I

Within days, the group was working with Mr. Wallace, whose company, Street Relations, offers services ranging from public relations to more opaque crisis management. He is a somewhat enigmatic figure with very little digital trail. But court records show that his clients have included Paramount Pictures and the YouTube personality Adin Ross.

And in a since-deleted LinkedIn profile, Mr. Wallace described himself as “a hired gun” with a “proprietary formula for defining artists and trends.”

‘That’s Why You Hired Me’

The Aug. 6 premiere brought the first wave of press coverage questioning what had happened during the filming. A Hollywood Reporter story speculated about a rift between Ms. Lively and Mr. Baldoni, after TikTokers noticed that the two stars didn’t pose for photographs together and that Ms. Lively and other cast members didn’t follow Mr. Baldoni on Instagram.

JUSTIN BALDONI

The unfollow situation is what everyone
is pointing at. Seemingly that something
is much bigger under the surface - as
why would they all unfollow

TAG PR EXECUTIVE

Weve flagged to Jed and his team as
well

Ms. Nathan had already been speaking to other journalists, according to text messages.

When Ms. Abel wrote to her Aug. 4 that “I’m having reckless thoughts of wanting to plant pieces this week of how horrible Blake is to work with. Just to get ahead of it,” Ms. Nathan replied that she had spoken off the record to an editor at The Daily Mail.

“She’s ready when we are,” Ms. Nathan wrote.

A flurry of articles followed the Hollywood Reporter piece. Many made it seem as if the only rift was over creative control. Some journalists had gotten wind of complaints about Mr. Baldoni’s behavior, but none of the most serious ones were published.

“He doesn’t realise how lucky he is right now,” Ms. Nathan texted Ms. Abel.

In other exchanges, Ms. Nathan claimed that she had kept allegations against him out of stories, writing in one message that major news outlets were “standing down on HR complaint.”

JENNIFER

So are we in the clear now?!

Did we survive

MELISSA

We survived

ALL Press is so overwhelming Weve
confused people So much mixed
messaging It’s actually really funny if
you think about it

Messages have been edited for length.

Meanwhile, an online backlash against Ms. Lively was underway. It is impossible to know how much of the negative publicity was seeded by Ms. Nathan, Mr. Wallace and their team, and how much they noticed and amplified.

On Aug. 10, Kjersti Flaa, a Norwegian entertainment reporter, uploaded to YouTube a 2016 interview in which Ms. Lively snapped back when Ms. Flaa commented on her baby “bump” and remained testy for the rest of the conversation. Ms. Flaa titled it “The Blake Lively interview that made me want to quit my job,” and told The Daily Mail that “it’s time that people behaving badly in Hollywood, or anywhere else for that matter, gets called out for it.”

After publication of this article, Ms. Flaa on Sunday contacted The Times and said she had not participated in any orchestrated effort to harm Ms. Lively’s reputation. In an email, she said that she had resurfaced the 2016 interview independently this past August. “It was neither coordinated nor influenced by anyone associated with the alleged campaign,” she wrote.

It wasn't the first time she had posted a video aligned with a client of Ms. Nathan. In 2022, in the midst of Mr. Depp's legal battle with Ms. Heard, Ms. Flaa posted clips of her interviews with the actor, tagged #JusticeForJohnnyDepp.



A video still of Kjersti Flaa, a Norwegian entertainment reporter, from her 2016 interview with Blake Lively. via YouTube

During the film rollout, Ms. Lively was also accused of being insensitive about domestic violence. The official promotion plan instructed the cast to focus more on the uplifting aspects of the movie than on abuse, and to embrace a floral theme (her character has a flower shop). In several appearances, she never made reference to domestic violence at all. And she faced criticism when her Betty Booze beverage company was promoting the film, given the role alcohol can play in abusive relationships.

Seeing that blowback, the text messages show, Mr. Baldoni and his P.R. team decided instead to highlight survivors of domestic violence in his interviews and social media.

More criticism came when Ms. Lively said in an interview that Mr. Reynolds, who had no role in the film, had helped rewrite a scene, prompting snarky comments about the actress leaning on her husband and speculation that he had violated the writers strike.

It is unclear exactly how Mr. Wallace operated. There are references in emails to “social manipulation” and “proactive fan posting,” and text messages cite efforts to “boost” and “amplify” online content that was favorable to Mr. Baldoni or critical of Ms. Lively.

“We are crushing it on Reddit,” Mr. Wallace told Ms. Nathan, according to a text she sent Ms. Abel on Aug. 9.

The next day, one of Ms. Nathan's employees texted, “We've started to see shift on social, due largely to Jed and his team's efforts to shift the narrative.”

Ms. Nathan wrote to Ms. Abel: “And socials are really really ramping up. In his favour, she must be furious. It's actually sad because it just shows you have people really want to hate on women.”

When a TikTok sleuth started asking questions about Mr. Baldoni, Ms. Abel texted that “this girl is on a very dangerous crusade.”

“We’ve flagged to Jed and his team for more serious action on the social side,” she wrote.

Throughout the text exchanges, Mr. Baldoni encourages the P.R. team, sometimes flagging social media posts for them to use. On Aug. 15, he proposes “flipping the narrative” on a positive story about Ms. Lively and her husband by “using their own words against them.”

Other times he appears to vacillate, seeking assurances about the tactics being deployed. When he notices a tabloid article critical of Ms. Lively, he sends a worried text: “How can we say somehow that we are not doing any of this — it looks like we are trying to take her down.” On another occasion, he wondered whether they were deploying fake “bot” accounts on social media.

“I can fully fully confirm we do not have bots,” Ms. Nathan wrote, adding that any digital team would be too intelligent to “utilise something so obvious.”

Mr. Wallace’s operation, she wrote, “is doing something very specific in terms of what they do. I know Jamey & Jed connected on this.”

Mr. Baldoni, Ms. Nathan and others on the team claimed in their text exchanges that Ms. Lively was using her own public relations team to create bad press about Mr. Baldoni but cited no evidence to support those claims.

By mid-August, the team was reveling in the damage to Ms. Lively’s image.

JENNIFER ABEL

The narrative online is so freaking good and fans are still sticking up for Justin and there literally has been no pickup of those two articles which is actually shocking to me. But I see this as a total success, as does Justin.

You did such amazing work

MELISSA NATHAN

Narrative is CRAZY good So did you.

The majority of socials are so pro Justin and I don’t even agree with half of them lol

Messages have been edited for length.

On Aug. 16, Ms. Nathan shared the Daily Mail article headlined “Is Blake Lively set to be CANCELLED?” with references to ‘hard to watch’ videos and a ‘tone deaf’ promotional Q. and A.

“Wow. You really outdid yourself with this piece,” Ms. Abel responded.

“That’s why you hired me right?” Ms. Nathan replied. “I’m the best.”

‘We Men Have to Step Up’

A brand marketing consultant, Terakeet, produced a report in August for Ms. Lively that concluded she had likely been the object of a “targeted, multichannel online attack” similar to one against Ms. Heard, and that it was damaging her reputation.

The report did not identify who was behind the attack. But by analyzing “the entirety of Google’s search index” for Ms. Lively’s name, it found that 35 percent of the results also included a reference to Mr. Baldoni. This was highly unusual given the length of her career, the company said, and suggested that the media environment was being manipulated.

A separate report, by Ms. Lively’s hair-care company, Blake Brown, concluded that the social media onslaught also had a negative effect on that business. Her product line, which had launched in August with record-breaking sales, estimates that it lost as much as 78 percent in sales.

With the recent arrival of “It Ends With Us” on Netflix, Mr. Baldoni has begun another round of promotion and messaging.

In an interview on “Access Hollywood,” he said “there is never an excuse” to “hurt a woman, physically or emotionally.” He added, “We men have to step up and figure out how we can be better allies.”

Produced by Leo Dominguez and Rumsey Taylor.

Megan Twohey is an investigative reporter at The Times. Her work has prompted changes to the law, criminal convictions and cultural shifts. More about Megan Twohey

Mike McIntire, an investigative reporter, has been with The Times since 2003. More about Mike McIntire

A version of this article appears in print on of the New York edition with the headline: Alleged Effort To Strike Back At Star Actress